

Exhibit B

Fee and Expense Detail

Staff Summary

Name of Professional	Position, State of Admission to Practice, Year Licensed	Hourly Rate	Effective Rate	Total Hours on Invoice	Total Fees
Matthew S. Okin	Partner, Texas 1992	\$675/hr	\$675/hr	111.6	\$75,330.00
Ryan A. O'Connor	Associate, Texas 2015	\$400/hr	\$400/hr	213.1	\$85,240.00
Bridget A. Moore	Legal Assistant	\$140/hr	\$140/hr	7	\$980.00
TOTALS				331.7	\$161,550.00

Fee Summary

Description	Hours	Blended Rate	Billed Amount
B110--Case Administration	69.3	\$471/hr	\$32,637.50
B120--Asset Analysis and Recovery	26.2	\$508/hr	\$13,312.50
B130--Asset Disposition	83.8	\$460/hr	\$38,580.00
B160--Fee/Employment Applications	52.7	\$437/hr	\$23,032.50
B170--Fee/Employment Objections	3.9	\$456/hr	\$1,780.00
B185--Assumption/Rejection of Leases and Contracts	1.1	\$400/hr	\$440.00
B210--Business Operations	43.6	\$548/hr	\$23,902.50
B230--Financing/Cash Collateral	49.7	\$549/hr	\$27,305.00
B240--Tax Issues	0.2	\$400/hr	\$80.00
B310--Claims Administration	1.2	\$400/hr	\$480.00
TOTALS	331.7	\$487/hr	\$161,550.00

Expense Summary

Description	Billed Amount
E101--In House Copying	\$12.50
E106--Online Research	\$191.97
E108--Postage	\$8.59
TOTALS	\$213.06

B110 -- Case Administration

Code	Date	Staff	Description	Hours	Rate	Billed Amount
B110	09/30/21	MSO	Discuss appointment as CRO with D. Brickley and begin reviewing order lifting stay (.7); discuss new engagement with R. O'Connor and begin list of to do items to get up to speed in case (.4); telephone conference with E. Seitz regarding new matters and work to be done (.6); follow-up discussion with D. Brickley (.3)	2	\$675/hr	\$1,350.00
B110	09/30/21	RAO	Review and analyze email correspondence and attachment from M. Okin re: CRO Order and conference call to discuss transition issues (.4); Exchange emails w/ M. Okin re: same (.2); Review Court's docket re: 9/30 hearing and pending pleadings and draft email to M. Okin re: same (.3);	0.9	\$400/hr	\$360.00
B110	10/01/21	BAM	Download and save MWE shared documents	0.5	\$140/hr	\$70.00
B110	10/01/21	MSO	Prepare for and participate in teleconference with client, lender's counsel and possible management company regarding possible management contract and other immediate issues to address (1.2); email discussion with M. McClure regarding call to discuss case status (.5); arrange for download and review of documents produced to MWE (.4); telephone call with counsel to GF Management regarding bankruptcy specific issues and terms of management agreement (.5)	2.6	\$675/hr	\$1,755.00
B110	10/01/21	RAO	Prepare for and attend conference call w/ Lenders counsel, Claro, and Management Co. re: transition to CRO, hotel management issues, and bankruptcy strategy issues (1.0); Review and analyze various email correspondence from M. Okin and M. McClure re: CRO transition issues and Debtor cooperation (.4); Review and analyze various email correspondence from Lender counsel and Claro team re: transition issues and document production (.6); Exchange emails w/ M. Okin and B. Moore re: doc production and review (.3); Conduct Lexis research re: Hotel and management contact and exchange emails w/ B. Roman re: same (.4);	2.7	\$400/hr	\$1,080.00
B110	10/04/21	BAM	Save MWE transcripts and upload to NetDocs	0.4	\$140/hr	\$56.00
B110	10/04/21	MSO	Begin review of hearing transcripts and other items from the docket to familiarize myself with facts of case (.6); telephone conference with M. McClure regarding status of case and items to be transitioned (.6)	1.2	\$675/hr	\$810.00
B110	10/04/21	RAO	Begin document review of hearing transcripts, bank account statements, and budgets (3.8); Review and analyze various email correspondence from M. Okin, D. Brickley, C. Tyler and M. McClure re: transition call, compliance w/ CRO Order, bank account issues, and related items (.9);	4.7	\$400/hr	\$1,880.00
B110	10/05/21	MSO	Telephone conference with D. Brickley regarding C. Tyler refusal to comply with court order and discussions with Chase (.5); email counsel for JPMC regarding compliance with order (.2); review and approve OA notices of appearance (.2); email correspondence with Claro and M. McClure regarding compliance (.3); email with Court regarding emergency status conference and discuss with R. O'Connor (.2); email M. McClure regarding reasons for status conference and communications with C. Tyler (.2); emails with E. Seitz and C. Gibbs regarding status conference and control of bank accounts (.3)	1.9	\$675/hr	\$1,282.50
B110	10/05/21	RAO	Draft notice of appearance for R. O'Connor and notice of appearance for M. Okin and confer w/ B. Moore re: filing same (.8); Review and analyze various email correspondence from M. Okin, M. McClure, D. Brickley, and C. Tyler re: emergency status conference, bank account issues, and transition items (.6); Additional phone and email correspondence w/ M. Okin and Court chambers re: same (.3); Review and analyze additional emails from M. Okin and E. Seitz re: case update and status conference issues (.2);	1.9	\$400/hr	\$760.00
B110	10/06/21	MSO	Telephone conference with D. Brickley regarding status of bank account issue and other operational items (.5); follow-up email with Court regarding status conference and further email discussion with M. McClure about reason for continued need for status conference (.4); review D. Brickley email to C. Tyler and comment (.3); discuss status with E. Seitz (.3)	1.5	\$675/hr	\$1,012.50
B110	10/06/21	RAO	Review and analyze various email correspondence from D. Brickley, C. Tyler, M. Okin and M. Cleveland re: bank account issues and emergency status conference (.6);	0.6	\$400/hr	\$240.00
B110	10/07/21	BAM	Research and create service list labels	1	\$140/hr	\$140.00
B110	10/07/21	MSO	Email discussion with Court, M. McClure and other parties regarding need for status conference and scheduling (.8); review and approve draft notice of status conference (.2); prepare for status conference and review various emails on issues to be discussed (.5); discuss status conference and prepare with D. Brickley (.5); attend emergency status conference (.8); discuss draft order to be submitted with R. O'Connor (.2); review and comment on proposed order (.4); further discussion with D. Brickley regarding Chase response and review emails regarding same (.5)	3.9	\$675/hr	\$2,632.50
B110	10/07/21	RAO	Review and analyze various email correspondence from K. Picota, M. Okin, M. McClure and E. Seitz re: emergency status conference (.5); Review Court's docket entry setting status conference, exchange emails w/ B. Moore re: same, and draft Notice of Emergency Status Conference (.6); File notice (.1); Review and analyze various email correspondence from D. Brickley and M. Okin re: bank account issues and Chase legal department (.3); Prepare for and attend emergency status conference (.7); Phone call w/ M. Okin re: results of same (.2); Draft proposed order re: bank account per Court's instructions at status conference, exchange emails w/ M. Okin re: draft of same, prep doc and file proposed order (.9); Review and analyze various email correspondence from M. Okin and D. Brickley re: Court's bank account order and contacting Chase bank re: same (.4); Review and analyze A. Casas notice of appearance for Chase bank (.1);	3.8	\$400/hr	\$1,520.00
B110	10/08/21	MSO	Discuss status of signature card change with D. Brickley and follow-up after trip to bank (.5); email discussion with other parties regarding partial compliance by JPMC and C. Tyler (.3); discuss notice with R. O'Connor, review and approve (.4)	1.2	\$675/hr	\$810.00

B110 -- Case Administration

Code	Date	Staff	Description	Hours	Rate	Billed Amount
B110	10/08/21	RAO	Review and analyze email correspondence from M. Okin re: Chase compliance w/ bank account order and drafting notice regarding same (.1); Draft Notice of Partial Compliance and exchange emails w/ M. Okin re: draft of same (.9); Review filed notice by M. Okin (.1);	1.1	\$400/hr	\$440.00
B110	10/11/21	BAM	Fax, email and CM/RRR letter to Matt Shell, CPA	0.3	\$140/hr	\$42.00
B110	10/11/21	BAM	Download ECF #87-93 from CourtLink for M. Okin	0.3	\$140/hr	\$42.00
B110	10/11/21	MSO	Email discussion with D. Brickley regarding open legal items to be completed (.4); review IHG statement with Court and reach out to IHG counsel regarding call to discuss case (.2)	0.6	\$675/hr	\$405.00
B110	10/11/21	RAO	Review and analyze email and letter correspondence from M. Okin and A. Casas re: Chase compliance w/ bank account orders (.2); Review email correspondence from D. Brickley and M. Cleveland re: bank account issues (.2); Draft letter M. McClure re: transfer of Debtor file to OA (.9); Review and analyze various email correspondence from M. Okin and Lender counsel re: case update issues (.2);	1.5	\$400/hr	\$600.00
B110	10/12/21	RAO	Review and analyze email correspondence from D. Brickley, M. Okin, and A. Casas re: Chase bank account issues (.2); Review and analyze email correspondence from M. Okin and Court chambers re: cancellation of 10/12 status conference (.2);	0.4	\$400/hr	\$160.00
B110	10/13/21	BAM	Fax, email and mail Emergency Motion to Direct Turnover to Matt Shell, CPA	0.3	\$140/hr	\$42.00
B110	10/14/21	BAM	Draft Notice of Hearing on Emergency Motion to Direct Turnover; draft Witness/Exhibit List for hearing; mail, fax and email Notice to Matt Shell, CPA	1.4	\$140/hr	\$196.00
B110	10/15/21	BAM	Download CPA documents to U: drive and discuss with R. O'Connor; email letter to Cheryl Tyler re: documents needed	2.5	\$140/hr	\$350.00
B110	10/18/21	BAM	Email to Cheryl Tyler re: hearing on 10/29; forward Cheryl Tyler emails to group	0.3	\$140/hr	\$42.00
B110	10/18/21	RAO	Meeting w/ M. Okin re: broker agreement, case strategy and status conference issues (.3);	0.3	\$400/hr	\$120.00
B110	10/19/21	RAO	Prepare for and attend continued status conference re: case administration issues (.5); Meet w/ M. Okin and D. Brickley re: results of same (.3);	0.8	\$400/hr	\$320.00
B110	10/19/21	MSO	Attend status conference (.5); Discuss results and case strategy with R. O'Connor and D. Brickley (.3)	0.8	\$675/hr	\$540.00
B110	10/22/21	MSO	Discuss next steps in case and general strategy with R. O'Connor (.3); telephone conference with E. Seitz regarding general plan for case and sale process (.4)	0.7	\$675/hr	\$472.50
B110	10/22/21	RAO	Meetings w/ M. Okin re: case strategy issues (.3);	0.3	\$400/hr	\$120.00
B110	11/29/21	MSO	Confer with R. O'Connor re: outstanding case issues and strategy	0.3	\$675/hr	\$202.50
B110	11/29/21	RAO	Meetings w/ M. Okin re: case strategy issues (.3);	0.3	\$400/hr	\$120.00
B110	12/02/21	RAO	Meetings w/ M. Okin re: case administration and sale strategy issues (.3);	0.3	\$400/hr	\$120.00
B110	12/07/21	RAO	Draft W&E list for 12.9.21 hearing and confer w/ M. Okin re: issues for same (.6);	0.6	\$400/hr	\$240.00
B110	12/27/21	RAO	Review and analyze email correspondence from M. Okin and M. McClure re: McClure's Debtor files and conversion to chapter 7 (.2);	0.2	\$400/hr	\$80.00
B110	01/03/22	RAO	Meetings w/ M. Okin re: SBA appeal of cash collateral order and related issues (.3); Review SBA's notice of appeal and transcript requests (.2);	0.5	\$400/hr	\$200.00
B110	01/04/22	MSO	Review lender email regarding foreclosure sale price and circulate to client and others (.3); review SBA draft dismissal of appeal and approve (.2); discussion with lender regarding mechanics of cash and other issues (.2); discussion with D. Brickley regarding same (.4)	1.1	\$675/hr	\$742.50
B110	01/04/22	RAO	Review and analyze email correspondence from D. Brickley, M. Okin and C. Tyler re: CPA termination of services (.2); Review and analyze email correspondence from E. Seitz, M. Okin and D. Brickley re: Debtor's PIP payment and related issues (.2); Review and analyze email correspondence from B. Roman and M. Okin re: McClure professional files from Debtor (.1);	0.5	\$400/hr	\$200.00
B110	01/04/22	RAO	Review and analyze email correspondence and attachment from R. Kincheloe and M. Okin re: stipulation dismissing SBA cash collateral appeal (.3);	0.3	\$400/hr	\$120.00
B110	01/05/22	MSO	Discuss status of transition with B. Roman and review BTTX agreement regarding termination (.4); email discussion with E. Seitz regarding transition issues and setting up transition call (.2)	0.6	\$675/hr	\$405.00
B110	01/05/22	RAO	Draft motion to convert case to chapter 7 and proposed order for same (3.2); Confer w/ M. Okin re: drafts and strategy for conversion (.2);	3.4	\$400/hr	\$1,360.00
B110	01/06/22	MSO	Participate in telephone conference with lender and BTTX regarding transition of operations (.5); follow-up discussion with Claro (.6)	1.1	\$675/hr	\$742.50
B110	01/07/22	MSO	Review remaining transition issues with D. Brickley and B. Roman (.5); review draft MORs and comment (.4)	0.9	\$675/hr	\$607.50
B110	01/07/22	RAO	Review and analyze email correspondence and attachments from B. Roman re: MORs and supporting docs for same (.3);	0.3	\$400/hr	\$120.00
B110	01/14/22	MSO	Review and comment on motion to covert case (.3); review UST motion to dismiss and follow-up with client regarding MORs (.2); discuss with R. O'Connor (.2)	0.7	\$675/hr	\$472.50
B110	01/14/22	RAO	Revise motion to convert and proposed order per M. Okin comments (1.0); Confer w/ M. Okin re: revised drafts (.2); Finalize motion and file same (.2); Email correspondence w/ B. Roman and D. Brickley re: MOR issues and analyze and edit drafts of same (.9); Review and analyze UST motion to dismiss case and confer w/ M. Okin re: same (.4);	2.7	\$400/hr	\$1,080.00
B110	01/17/22	MSO	Conference with R. O'Connor regarding conversion hearing and MOR issues	0.2	\$675/hr	\$135.00
B110	01/17/22	RAO	Exchange emails w. B. Roman re: MOR revisions (.2); Meet w/ M. Okin re: hearing on conversion (.2);	0.4	\$400/hr	\$160.00
B110	01/18/22	MSO	Telephone conference with L. Lerner regarding dismissal as an alternative to conversion (.2); discuss same with D. Brickley (.3)	0.5	\$675/hr	\$337.50

B110 -- Case Administration

Code	Date	Staff	Description	Hours	Rate	Billed Amount
B110	01/18/22	RAO	Draft W&E list for 1/20 hearing (.6); Confer w/ M. Okin re: exhibits for same (.1); Revise draft, compile exhibits, and file W&E list (.3); Meeting w/ M. Okin re: IHG request to dismiss case and strategy for same (.2); Review and analyze email correspondence from L. Lerner and R. Kincheloe re: same (.2); Review email correspondence and attachments from B. Roman re: revised MOR drafts and confer w/ M. Okin re: issues for same (.5);	1.9	\$400/hr	\$760.00
B110	01/19/22	MSO	Conference with R. O'Connor regarding exhibit list for conversion hearing (.2); email discussion among IHG, SBA and LNR regarding dismissal instead of conversion (.2)	0.4	\$675/hr	\$270.00
B110	01/19/22	RAO	Review, revise, and finalize MORs for July through December 2021 and file same (1.2); Review email correspondence from M. Okin and other parties re: agreement to seek dismissal and withdraw Debtor's conversion motion (.3); Meet w/ M. Okin re: same and strategy for hearing (.2);	1.7	\$400/hr	\$680.00
B110	01/20/22	MSO	Prepare for and participate in hearing on conversion of case and CBRE fee application (1.1); post hearing discussion with R. O'Connor (.3)	1.4	\$675/hr	\$945.00
B110	01/20/22	RAO	Meet w/ M. Okin re: hearing issues on conversion, dismissal, cash collateral, and CBRE fee app (.2); Review and exchange emails w/ D. DeMarco re: hearing on CBRE fee app and attendance (.2); Prepare for and attend hearing (.7); Review Court's order on CBRE fee app (.1); Meet w/ M. Okin re: results of hearing and strategy for dismissal and final fee applications (.2);	1.4	\$400/hr	\$560.00
B110	01/24/22	MSO	Review motion to dismiss case and discuss with R. O'Connor (.6); conference with D. Brickley regarding mechanics of dismissal (.3)	0.9	\$675/hr	\$607.50
B110	01/24/22	RAO	Draft motion to dismiss bankruptcy case and proposed order (3.1); Confer w/ M. Okin re: revisions to same (.1); Revise drafts per comments received (.9); Exchange emails w/ CRO re: drafts of motion and order, prep docs and file same (.2)	4.3	\$400/hr	\$1,720.00
TOTALS				69.3	\$471/hr	\$32,637.50

B120 -- Asset Analysis and Recovery

Code	Date	Staff	Description	Hours	Rate	Billed Amount
B120	10/08/21	MSO	Email discussion with L. Miller and D. Brickley regarding M. Shell cooperation (.3); discuss status of M. Shell employment by estate with D. Brickley and R. O'Connor (.3)	0.6	\$675/hr	\$405.00
B120	10/11/21	MSO	Discuss issue with obtaining records from accountant with Claro (.3); draft and send letter to M. Shell regarding turning over Debtor accounting records (.4)	0.7	\$675/hr	\$472.50
B120	10/12/21	MSO	Email response to M. Shell regarding letter	0.2	\$675/hr	\$135.00
B120	10/12/21	RAO	Review and analyze various email correspondence from M. Shell and M. Okin re: CPA turnover of books and records (.2); Meet w/ M. Okin re: turnover motion for CPA books and records (.1); Begin formatting and drafting turnover motion (.5);	0.8	\$400/hr	\$320.00
B120	10/13/21	MSO	Discuss status of books and records request to accountant with Claro (.2); conference with R. O'Connor regarding motion for turnover (.2); review motion and comment (.3); finalize and approve motion for filing (.2); discuss scheduling of hearing with client and court (.3); email discussion with M. Shell to arrange turnover (.2)	1.4	\$675/hr	\$945.00
B120	10/13/21	RAO	Continue drafting and editing turnover motion and proposed order (2.9); Legal research re: turnover of accountant files under 542(e) of the bankruptcy code (.5); Review and exchange various email correspondence w/ M. Okin, D. Brickley, L. Miller and B. Roman re: revisions to motion and order, and incorporate comments to same (.4); Finalize motion, file, and email Court chambers re: emergency motion (.3); Confer w/ B. Moore re: service of motion to CPA (.1); Review and analyze various response emails from M. Shell, D. Brickley, M. Okin and L. Miller re: turnover motion issues and hearing on same (.4); Review response emails from Court re: hearing on motion (.1); Meetings w/ M. Okin re: hearing issues for CPA turnover and case strategy issues (.4);	5.1	\$400/hr	\$2,040.00
B120	10/14/21	MSO	Review notice of hearing and comment (.2); email discussion with M. Shell regarding notice of hearing and need to produce documents (.3); set up link for M. Shell download and manage upload of documents for Claro access (.7); review emails produced by M. Shell (.5); respond to M. Shell regarding access to Quick Books data file (.2); discuss QB issue with Claro and needs at hearing tomorrow (.3)	2.2	\$675/hr	\$1,485.00
B120	10/14/21	RAO	Review and analyze various email correspondence from M. Shell, M. Okin, D. Brickley and L. Miller re: CPA files uploaded to ShareFile (.5);	0.5	\$400/hr	\$200.00
B120	10/14/21	RAO	Review and exchange email correspondence w/ M. Okin and B. Moore re: certificate of notice from Court and drafting notice of hearing on turnover motion and W&E list for same (.2); Review draft notice of hearing from B. Moore, confer w/ M. Okin re: edits to same, incorporate edits and file notice of hearing (.6); Confer w/ B. Moore re: service of same to CPA (.1); Draft W&E list for turnover hearing and confer w/ M. Okin re: draft, exhibits, and witnesses needed (.6); Compile exhibits and file W&E list (.4); Review and analyze Lender W&E list for turnover hearing (.1);	1.9	\$400/hr	\$760.00
B120	10/15/21	MSO	Discuss documents from CPA with R. O'Connor and review highlights (.8); review letter to C. Tyler regarding QB access and discuss service of same (.4); meet with D. Brickley and B. Roman in advance of hearing on turnover (.5); participate in hearing on turnover and discuss results with R. O'Connor (.8)	2.5	\$675/hr	\$1,687.50
B120	10/15/21	RAO	Begin doc review of CPA ShareFile production and confer w/ M. Okin and B. Moore re: same (3.2); Draft letter correspondence to C. Tyler re: production of financial records and QuickBooks information (.8); Confer w/ M. Okin and B. Moore re: draft and service of letter to C. Tyler (.2); Prepare for and attend emergency hearing on turnover of CPA records (.5); Meet w/ M. Okin re: results of same (.1); Review Court's order setting emergency status conference (.1);	4.9	\$400/hr	\$1,960.00
B120	10/18/21	MSO	Review C. Tyler emails and discuss upcoming status conference via email with M. McClure (.5); prepare for status conference on accounting information (.4)	0.9	\$675/hr	\$607.50
B120	10/18/21	RAO	Continue doc review of CPA production files (1.7); Review and analyze email correspondence from M. Okin, B. Moore and C. Tyler re: doc production and status conference (.2);	1.9	\$400/hr	\$760.00
B120	10/19/21	MSO	Meeting with D. Brickley and B. Roman in advance of status conference related to QuickBooks data (.8); participate in status conference (.5); work with Claro regarding access to QB after hearing (.5)	1.8	\$675/hr	\$1,215.00
B120	10/20/21	RAO	Review and analyze various email correspondence from D. Brickley, C. Tyler and M. Okin re: Debtor QuickBooks issues (.4); Review and analyze various email correspondence and attachments from D. Brickley, B. Roman and E. Seitz re: Debtor's insurance policy issues (.4);	0.8	\$400/hr	\$320.00
TOTALS				26.2	\$508/hr	\$13,312.50

B130 -- Asset Disposition

Code	Date	Staff	Description	Hours	Rate	Billed Amount
B130	10/07/21	MSO	Prepare for and participate in telephone interview with CBRE	0.7	\$675/hr	\$472.50
B130	10/08/21	MSO	Prepare for and participate on video interview of 1912 Ventures	0.7	\$675/hr	\$472.50
B130	10/12/21	MSO	Discuss retention of broker with D. Brickley and review emails to CBRE	0.2	\$675/hr	\$135.00
B130	10/12/21	MSO	Email discussion with IHG counsel (.2); telephone conference with L. Lerner regarding IHG position and inspection of property (.5); set up property inspection with IHG and Claro (.2)	0.9	\$675/hr	\$607.50
B130	10/15/21	MSO	Review CBRE agreement and reach out to them to discuss adapting to BK process (.4); discuss needed revisions with R. O'Connor (.2)	0.6	\$675/hr	\$405.00
B130	10/18/21	MSO	Review CBRE listing agreement redline and other retention information (.3); discuss listing agreement and sale process with R. O'Connor (.2)	0.5	\$675/hr	\$337.50
B130	10/26/21	MSO	Review lender changes to CBRE and discuss with R. O'Connor	0.4	\$675/hr	\$270.00
B130	10/28/21	RAO	Review and analyze email correspondence from M. Nguyen and B. Roman re: CBRE conference call for sale process (.2);	0.2	\$400/hr	\$80.00
B130	11/03/21	MSO	Review due diligence information for CBRE (.3); review and facilitate execution of final listing agreement (.2)	0.5	\$675/hr	\$337.50
B130	11/04/21	MSO	Review draft sale procedures and discuss changes with R. O'Connor	0.5	\$675/hr	\$337.50
B130	11/04/21	RAO	Meetings w/ M. Okin re: sale strategy, sale motion and sale procedures (.4); Begin formatting and drafting proposed sale procedures (3.8);	4.2	\$400/hr	\$1,680.00
B130	11/05/21	RAO	Continue drafting sale procedures (1.3);	1.3	\$400/hr	\$520.00
B130	11/08/21	MSO	Discuss sale procedures and other sale issues with R. O'Connor	0.4	\$675/hr	\$270.00
B130	11/08/21	RAO	Review and analyze various email correspondence from L. Lerner and M. Okin re: conference call to discuss IHG and sale issues (.3); Meetings w/ M. Okin re: sale procedures and sale strategy issues (.3); Continue drafting sale procedures (1.8);	2.4	\$400/hr	\$960.00
B130	11/09/21	MSO	Discuss sale procedures with R. O'Connor (.4); email exchange with CBRE and client to set up call on procedures for sale process (.2)	0.6	\$675/hr	\$405.00
B130	11/09/21	RAO	Review and analyze email correspondence from M. Okin and CBRE re: sale procedures and marketing diligence items (.4); Continue drafting proposed sale procedures (.9); Attend conference call w/ M. Okin, B. Roman and IHG rep re: business issues and sale process (.6); Exchange emails w/ B. Roman re: Hotel PIP for sale process (.2);	2.1	\$400/hr	\$840.00
B130	11/10/21	RAO	Meet w/ M. Okin re: proposed sale procedures and revisions to same (.3); Continue editing proposed sale procedures per comments received (1.1);	1.4	\$400/hr	\$560.00
B130	11/11/21	MSO	Review draft sale procedures with R. O'Connor and comment (.4); circulate procedures in advance of call (.2); participate in call with CBRE to discuss sale process and timing (.8)	1.4	\$675/hr	\$945.00
B130	11/11/21	RAO	Review and analyze email correspondence from M. Okin re: sale procedures (.1); Prepare for and attend call w/ CBRE and Claro re: sale procedures issues (1.1);	1.2	\$400/hr	\$480.00
B130	11/12/21	MSO	Review revised procedures and finalize (.3); circulate sale procedures to E. Seitz and R. Kincheloe for comments (.2); respond to R. Kincheloe inquiry (.2); discuss procedures with R. O'Connor (.2)	0.9	\$675/hr	\$607.50
B130	11/12/21	RAO	Continue editing sale procedures per comments received on CBRE and Claro call (1.2); Review and analyze email correspondence from M. Okin, R. Kincheloe and E. Seitz re: sale procedures (.3); Meetings w/ M. Okin re: same (.3);	1.8	\$400/hr	\$720.00
B130	11/15/21	MSO	Review lender comments on sale procedures	0.3	\$675/hr	\$202.50
B130	11/15/21	RAO	Begin formatting and drafting sale motion (3.7); Review and analyze email correspondence from E. Seitz and M. Okin re: sale procedures and Lender comments (.3);	4	\$400/hr	\$1,600.00
B130	11/16/21	RAO	Begin formatting and drafting form of sale APA (4.8); Various meetings w/ M. Okin re: case strategy, operator employment, budget, and sale issues (.4)	5.2	\$400/hr	\$2,080.00
B130	11/18/21	RAO	Continue drafting form APA (2.3);	2.3	\$400/hr	\$920.00
B130	11/22/21	MSO	Email discussion with CBRE and CRO regarding sale process and follow-up on open issues (.3); conference with R. O'Connor regarding sale status and APA (.2); review sale procedures and current draft of APA (1.1)	1.6	\$675/hr	\$1,080.00
B130	11/22/21	RAO	Review and analyze email correspondence from CBRE, Claro and M. Okin re: conference call and sale issues (.3); Continue drafting sale motion and form APA (3.9);	4.2	\$400/hr	\$1,680.00
B130	11/23/21	MSO	Prepare for and participate in conference call with CBRE and Claro regarding sale process	0.8	\$675/hr	\$540.00
B130	11/23/21	RAO	Prepare for and attend conference call w/ CBRE re: sale issues (.8); Continue editing form APA (1.7);	2.5	\$400/hr	\$1,000.00
B130	11/29/21	MSO	Conference with R. O'Connor regarding case strategy and moving forward with sale and retention of GF (.4); discussion with CBRE and Claro regarding sale process (.2); review GF retention documents and approve for filing (.4)	1	\$675/hr	\$675.00
B130	11/29/21	RAO	Continue drafting sale motion, sale procedures, and form APA (3.7);	3.7	\$400/hr	\$1,480.00
B130	11/30/21	MSO	Discussion with IHG regarding sale process	0.5	\$675/hr	\$337.50
B130	11/30/21	MSO	Review drafts of sale motion and other documents and comment (.3); conference with R. O'Connor regarding sale process (.3)	0.6	\$675/hr	\$405.00

B130 -- Asset Disposition

Code	Date	Staff	Description	Hours	Rate	Billed Amount
B130	11/30/21	RAO	Meetings w/ M. Okin and D. Brickley re: case strategy and sale issues (.4); Edit sale motion and sale procedures and draft email to E. Seitz re: same (.4); Review and analyze email correspondence and attachments from B. Roman re: sale motion and sale procedures (.4); Review and analyze email correspondence and attachments from CBRE re: sale and marketing update items (.5); Legal research re: statutory predicates for sales and contract assumption (.5); Review and exchange emails w/ L. Clayton re: executory contracts and cure schedule (.3); Continue drafting form APA (5.6); Meet w/ M. Okin re: APA issues (.3);	8.4	\$400/hr	\$3,360.00
B130	12/01/21	MSO	Telephone conference with E. Seitz and C. Gibbs regarding sale process and bidding issues	0.5	\$675/hr	\$337.50
B130	12/01/21	RAO	Review and analyze Lender comments to sale motion and email correspondence from M. Okin and E. Seitz re: bidding procedures issues (.3); Confer w/ M. Okin re: strategy for same (.2);	0.5	\$400/hr	\$200.00
B130	12/02/21	MSO	Discuss sale issues with R. O'Connor	0.3	\$675/hr	\$202.50
B130	12/02/21	RAO	Review and exchange emails and contract attachments w/ L. Clayton re: executory contracts issues for sale process (.4); Draft and edit proposed contract exhibit and proposed cure notice for sale process (.8); Continue drafting and editing sale motion, bid procedures, and proposed scheduling order (3.4);	4.6	\$400/hr	\$1,840.00
B130	12/06/21	RAO	Review email correspondence from CBRE re: sale and APA issues (.2); Continue drafting and editing proposed APA (3.8); Meetings w/ M. Okin re: APA issues and edits (.2);	4.2	\$400/hr	\$1,680.00
B130	12/06/21	MSO	Discuss APA issues and strategy with R. O'Connor	0.2	\$675/hr	\$135.00
B130	12/07/21	MSO	Review and comment on draft APA (.4); respond to inquiry from C. Rubio regarding status of sale process and foreclosure (.3); discuss scheduling of call with lender and CBRE regarding status of sale process (.2)	0.9	\$675/hr	\$607.50
B130	12/07/21	RAO	Continue editing proposed APA (2.3); Exchange emails w/ M. Okin re: APA edits (.2); Review and analyze M. Okin edits to same (.1); Draft email to Debtor working group re: form APA for bidders (.2); Draft email to Lender re: form APA (.1);	2.9	\$400/hr	\$1,160.00
B130	12/07/21	RAO	Review and analyze email correspondence from M. Okin and CBRE conference call w/ Lender re: sale issues (.2);	0.2	\$400/hr	\$80.00
B130	12/08/21	MSO	Set up call with CBRE and Lender and participate	1	\$675/hr	\$675.00
B130	12/08/21	RAO	Review and analyze email correspondence from CBRE, M. Okin and E. Seitz re: conference call for sale issues (.2); Prepare for and attend conference call re: sale issues (.5); Draft email to M. Okin and D. Brickley re: results of same (.1);	0.8	\$400/hr	\$320.00
B130	12/09/21	MSO	Review and approve R. O'Connor's additions to PSA	0.5	\$675/hr	\$337.50
B130	12/09/21	RAO	Continue drafting and editing proposed APA per comments received from CBRE and M. Okin (1.7); Draft email to CBRE working group re: APA for bidders (.2);	1.9	\$400/hr	\$760.00
B130	12/10/21	MSO	Email discussion regarding lender decision regarding continuing with sale and forward to client (.2); review CBRE marketing update (.2)	0.4	\$675/hr	\$270.00
B130	12/10/21	RAO	Review and analyze email correspondence from E. Seitz and M. Okin re: foreclosure notice (.1); Analyze Lender's foreclosure notice and discuss same w/ M. Okin (.4); Review and analyze email correspondence from CBRE re: marketing update letter for sale process (.2);	0.7	\$400/hr	\$280.00
B130	12/11/21	MSO	Draft and send response to lender email on sale process and forward proposed budget and marketing materials	0.3	\$675/hr	\$202.50
B130	12/13/21	MSO	Review buyer inquiry regarding PSA and clarifications from R. O'Connor and respond	0.7	\$675/hr	\$472.50
B130	12/13/21	RAO	Review and analyze email correspondence from bidder and M. Okin re: sale and APA issues, analyze issues, and draft response to M. Okin (.5);	0.5	\$400/hr	\$200.00
B130	12/14/21	MSO	Review CBRE bid matrix and discuss with D. Brickley (.4); discuss sale results via email with E. Seitz (.1)	0.5	\$675/hr	\$337.50
B130	12/14/21	RAO	Various meetings w/ M. Okin re: sale and Lender foreclosure issues (.5); Review and analyze various email correspondence from CBRE, D. Brickley and M. Okin re: conference call for sale issues (.3); Prepare for and attend conference call (.8); Review and analyze email correspondence and attachments from CBRE re: bidding summary and signed APAs (.5); Review and analyze various email correspondence from M. Okin, D. Brickley, and E. Seitz re: sale issues and cash collateral (.3);	2.4	\$400/hr	\$960.00
B130	12/15/21	RAO	Review and exchange various email correspondence w/ M. Okin, E. Seitz, and C. Gibbs re: sale and foreclosure issues (.6); Various meetings w/ M. Okin re: same (.3);	0.9	\$400/hr	\$360.00
B130	01/04/22	RAO	Review email correspondence from M. Okin, E. Seitz and D. Brickley re: foreclosure issues and meet w/ M. Okin re: Lender purchase of property at foreclosure sale (.4);	0.4	\$400/hr	\$160.00
B130	01/05/22	RAO	Review Lender's notice of winning bid at foreclosure sale (.1); Review and analyze email correspondence from B. Roman, M. Okin and E. Seitz re: foreclosure issues, BTTX management agreement, and transition issues (.5);	0.5	\$400/hr	\$200.00
TOTALS				83.8	\$460/hr	\$38,580.00

B160 -- Fee/Employment Applications

Code	Date	Staff	Description	Hours	Rate	Billed Amount
B160	10/05/21	RAO	Review docket and begin formatting and drafting application to employ Okin Adams, declaration in support, and proposed order (3.3);	3.3	\$400/hr	\$1,320.00
B160	10/08/21	MSO	Draft notice of Claro engagement letter and file with court (.6)	0.6	\$675/hr	\$405.00
B160	10/08/21	RAO	Review and analyze email and attachment from B. Roman re: Claro engagement letter and filing same (.3); Review filed notice by M. Okin re: Claro engagement letter (.2); Review various email correspondence from M. Okin, L. Miller, L. Clayton, and D. Brickley re: CPA employment, compliance w/ Claro document requests and related issues (.2); Review pleadings and draft response email to M. Okin re: CPA employment (.2);	0.9	\$400/hr	\$360.00
B160	10/12/21	MSO	Review Claro application to employ and approve (.2); review OA application to employ and approve (.3)	0.5	\$675/hr	\$337.50
B160	10/12/21	RAO	Review and analyze email correspondence and attachments from B. Roman re: Debtor's application to employ Claro, declaration, and order, and make redline edits to same (1.6); Confer w/ M. Okin re: application to employ OA and continue editing same per comments (.9); Exchange emails w/ M. Okin and D. Brickley re: approval of OA employment application, prep docs and exhibits, and file same (.3);	2.8	\$400/hr	\$1,120.00
B160	10/13/21	RAO	Review and exchange emails w/ Claro team re: finalizing Claro employment application (.1); Analyze B. Roman edits to Claro employment application (.2); Finalize and file Claro employment application and draft response email to Claro re: same (.3);	0.6	\$400/hr	\$240.00
B160	10/14/21	RAO	Review and analyze M. McClure final fee application, exhibits, and proposed order, and draft email to Claro team re: same (.4);	0.4	\$400/hr	\$160.00
B160	10/15/21	RAO	Meeting w/ M. Okin re: employment of CBRE as property broker (.2); Begin reviewing and editing listing agreement (2.4); Review and exchange email correspondence w/ M. Okin and CBRE counsel re: listing agreement and employment application (.2);	2.8	\$400/hr	\$1,120.00
B160	10/18/21	RAO	Continue reviewing and editing CBRE listing agreement (2.6); Draft email to M. Okin re: redline of same (.1); Begin drafting and editing application to employ CBRE as broker (2.8);	5.5	\$400/hr	\$2,200.00
B160	10/20/21	MSO	Conference with R. O'Connor regarding changes to CBRE listing agreement (.3); review SBA counsel email and respond (.3); review CBRE employment application and other documents and review lender comments to listing agreement (.2);	0.8	\$675/hr	\$540.00
B160	10/20/21	RAO	Continue editing CBRE broker agreement and meet w/ M. Okin re: circulating draft (1.1); Draft emails to Claro, Lender, and SBA counsel re: broker agreement (.3); Analyze various response emails from SBA counsel and M. Okin re: same (.3); Review and analyze Lender comments to draft (.4); Continue editing CBRE employment application, declaration and order, and draft email to CBRE group re: employment app and listing agreement (1.8); Review response email from CBRE counsel re: same (.1);	4	\$400/hr	\$1,600.00
B160	10/21/21	RAO	Review and exchange various emails w/ E. Seitz and M. Okin re: CBRE listing agreement (.2);	0.2	\$400/hr	\$80.00
B160	10/22/21	RAO	Review and analyze email correspondence from J. Repking re: CBRE employment app and declaration issues (.1); Review and exchange email correspondence w/ E. Seitz re: lender approval of CBRE agreement (.2);	0.3	\$400/hr	\$120.00
B160	10/25/21	RAO	Review and analyze email correspondence and attachments from J. Repking re: CBRE application and conflicts lists and draft response re: edits to declaration (.4);	0.4	\$400/hr	\$160.00
B160	10/26/21	RAO	Review and analyze email correspondence and attachment from E. Seitz re: addition redline edits to CBRE agreement (.3); Meet w/ M. Okin re: same (.2); Edit CBRE employment declaration and exchange emails w/ J. Repking re: revisions to same (.5);	1	\$400/hr	\$400.00
B160	10/27/21	RAO	Review and analyze various email correspondence from E. Seitz, M. Okin, D. Brickley and B. Roman re: GF management agreement, cash collateral and related issues (.3); Review and analyze email correspondence from B. Roman, M. Yu, and M. Nguyen re: conference call to discuss CBRE sale strategy (.3); Continue drafting and editing CBRE listing agreement per comments received and meet w/ M. Okin re: same (2.4); Exchange emails w/ M. Okin re: circulating revised draft (.1); Draft email to CBRE working group re: same (.2);	3.3	\$400/hr	\$1,320.00
B160	10/28/21	RAO	Review email correspondence from M. Okin and A. Price re: GF management agreement redline and draft response to M. Okin (.2);	0.2	\$400/hr	\$80.00
B160	11/01/21	RAO	Review and analyze email correspondence and attachments from M. Okin, D. Brickley and B. Roman re: GF management employment and CBRE employment issues (.6);	0.6	\$400/hr	\$240.00
B160	11/02/21	MSO	Conference call with CBRE regarding retention and sale process	0.6	\$675/hr	\$405.00
B160	11/02/21	RAO	Review and analyze email correspondence from M. Okin and CBRE re: engagement agreement markup and conference call (.4);	0.4	\$400/hr	\$160.00
B160	11/04/21	MSO	Review final CBRE employment application and approve for filing (.3); discuss order with R. O'Connor (.3)	0.6	\$675/hr	\$405.00
B160	11/04/21	RAO	Exchange emails w/ D. Brickley and M. Okin re: CBRE engagement agreement and edits to CBRE app (.4); Review, edit, and finalize CBRE employment application, exhibits, and proposed order and confer w/ M. Okin re: filing same (.9); File CBRE employment app and draft email to Court re: hearing date for same (.3);	1.6	\$400/hr	\$640.00
B160	11/05/21	MSO	Review revisions to GF agreement and comment (.2); review revisions to same (.2); address L. Lerner comment on CBRE employment app and discuss with D. Brickley (.2)	0.6	\$675/hr	\$405.00
B160	11/05/21	RAO	Review, analyze and exchange various email correspondence w/ M. Okin and Claro re: revisions to GF management agreement, redline agreement and incorporate comments, and draft response email re: revised draft (2.4); Review and analyze various email correspondence from K. Picota, M. Okin and D. Brickley re: hearing on CBRE employment (.3); Draft and file Notice of Hearing on CBRE employment app (.5); Review and analyze various email correspondence from L. Lerner, M. Okin and D. Brickley re: IHG PIP and CBRE employment app issues (.4);	3.6	\$400/hr	\$1,440.00

B160 -- Fee/Employment Applications

Code	Date	Staff	Description	Hours	Rate	Billed Amount
B160	11/09/21	MSO	Review and comment on draft witness and exhibit list for CBRE retention (.3); prepare for hearing and review documents (.4); review court order employing CBRE and circulate to group (.3)	1	\$675/hr	\$675.00
B160	11/09/21	RAO	Draft W&E list for CBRE employment hearing and exchange emails w/ M. Okin re: draft of same (.6); Prep exhibits and file W&E list (.3); Review and analyze Court's order granting CBRE employment app and various email correspondence from M. Okin, Lender and IHG counsel re: same (.4);	1.3	\$400/hr	\$520.00
B160	11/16/21	RAO	Continue drafting and editing operator employment application and proposed order (1.7); Review and exchange various email correspondence and attachments w/ M. Okin, E. Seitz, and Claro re: drafts and edits to same (.4);	2.1	\$400/hr	\$840.00
B160	11/17/21	RAO	Review and analyze Lender comments to operator employment app and incorporate comments to same (.4); Draft email to M. Okin re: finalizing employment app (.1);	0.5	\$400/hr	\$200.00
B160	11/24/21	RAO	Review and analyze email correspondence from M. Okin, A. Price, D. Brickley, E. Seitz and B. Roman re: revisions to GF management agreement and employment issues (.7); Edit employment application and proposed order and circulate drafts to working group (.4);	1.1	\$400/hr	\$440.00
B160	11/29/21	RAO	Email correspondence w/ B. Roman, D. Brickley and M. Okin re: revisions to GF agreement and employment application (.3); Confer w/ M. Okin re: same (.4); Edit GF employment app, order, and exhibits, and file same (.8);	1.5	\$400/hr	\$600.00
B160	11/30/21	RAO	Review and analyze email correspondence from K. Picotta re: hearing set on GF employment app (.1); Review and analyze B. Moore draft of Notice of Hearing, edit same, and file (.3);	0.4	\$400/hr	\$160.00
B160	12/09/21	RAO	Review email correspondence from M. Okin re: hearing on BTTX employment (.1); Prepare for and attend hearing on employment app (.4);	0.5	\$400/hr	\$200.00
B160	01/06/22	MSO	Telephone conference with CBRE counsel regarding final fee application (.3); review draft (.3)	0.6	\$675/hr	\$405.00
B160	01/06/22	RAO	Review email correspondence and attachments from M. Okin and D. DeMarco re: CBRE final fee application (.3); Review email correspondence from M. Okin and E. Seitz re: same and payment of CBRE by Lender (.2);	0.5	\$400/hr	\$200.00
B160	01/07/22	MSO	Follow-up calls with CBRE counsel regarding fee application	0.5	\$675/hr	\$337.50
B160	01/10/22	MSO	Discuss CBRE application to R. O'Connor (.2); review revisions and forward to D. DeMarco for review (.2)	0.4	\$675/hr	\$270.00
B160	01/10/22	RAO	Meet w/ M. Okin re: CBRE fee app issues (.2); Review and redline CBRE draft and analyze email correspondence w/ M. Okin and CBRE re: same (1.2);	1.4	\$400/hr	\$560.00
B160	01/11/22	RAO	Review and redline proposed order on CBRE fee app (.4); Review and exchange email correspondence w/ D. DeMarco and M. Okin re: same (.1); File CBRE fee application (.3);	0.8	\$400/hr	\$320.00
B110	01/25/22	MSO	Conference with R. O'Connor regarding fee applications (.2); discuss payment issues with CBRE counsel (.2); conference with B. Roman regarding mechanics of dismissal and fee applications (.5)	0.9	\$675/hr	\$607.50
B160	01/25/22	RAO	Review and analyze various email correspondence from B. Roman and M. Okin re: filing final fee applications and issues for same (.2); Meet w/ M. Okin re: strategy for fee apps (.2); Begin drafting OA final fee application and proposed order (2.9); Review and analyze various email correspondence from D. DeMarco, M. Okin and D. Brickley re: payment of CBRE fee (.3);	3.6	\$400/hr	\$1,440.00
TOTALS				52.7	\$437/hr	\$23,032.50

B170 -- Fee/Employment Objections

Code	Date	Staff	Description	Hours	Rate	Billed Amount
B170	10/26/21	MSO	Discuss objection to McClure fee app with R. O'Connor (.2); discuss same with client (.2)	0.4	\$675/hr	\$270.00
B170	10/26/21	RAO	Review and analyze McClure fee app and exhibits (.4); Meet w/ M. Okin re: potential objection and resolving same (.2); Draft and exchange emails w/ D. Brickley and B. Roman re: objection to fee app and resolution (.3); Exchange emails w/ B. Moore re: objection deadline (.1);	1	\$400/hr	\$400.00
B170	11/02/21	RAO	Exchange emails w/ M. Okin re: resolution of objections to McClure fee application (.1);	0.1	\$400/hr	\$40.00
B170	11/03/21	MSO	Email exchange with M. McClure regarding fee application resolution	0.2	\$675/hr	\$135.00
B170	11/03/21	RAO	Review and exchange emails w/ M. Okin and McClure re: resolution of objections to McClure fee app (.2);	0.2	\$400/hr	\$80.00
B170	11/04/21	MSO	Review and approve stipulation with M. McClure over fees	0.2	\$675/hr	\$135.00
B170	11/04/21	RAO	Review and exchange emails w/ M. Okin and M. McClure re: McClure fee stip (.2);	0.2	\$400/hr	\$80.00
B170	11/04/21	RAO	Draft stipulation and agreed order re: McClure fee app (.7);	0.7	\$400/hr	\$280.00
B170	11/05/21	RAO	Edit and file stipulation and agreed order re: McClure fee app (.2);	0.2	\$400/hr	\$80.00
B170	11/08/21	RAO	Review and analyze Court's order on McClure fee stip and final fee app (.2); Exchange emails w/ M. Okin and K. Picota re: fee order issues (.3);	0.5	\$400/hr	\$200.00
B170	11/09/21	RAO	Review and analyze email correspondence from K. Picota re: corrected order on McClure fee app (.2);	0.2	\$400/hr	\$80.00
TOTALS				3.9	\$456/hr	\$1,780.00

B185 -- Assumption/Rejection of Leases and Contracts

Code	Date	Staff	Description	Hours	Rate	Billed Amount
B185	11/11/21	RAO	Review Debtor's schedules and draft email to Claro re: executory contracts and sale process (.4);	0.4	\$400/hr	\$160.00
B185	11/16/21	RAO	Draft email to B. Roman re: executory contracts for assumption and review response email (.1);	0.1	\$400/hr	\$40.00
B185	11/29/21	RAO	Email correspondence w/ B. Roman and D. Brickley re: executory contracts (.2),	0.2	\$400/hr	\$80.00
B185	12/09/21	RAO	Review and exchange emails w/ L. Clayton re: Debtor's executory contracts (.2); Exchange additional emails w/ CBRE re: executory contracts (.2);	0.4	\$400/hr	\$160.00
TOTALS				1.1	\$400/hr	\$440.00

B210 -- Business Operations

Code	Date	Staff	Description	Hours	Rate	Billed Amount
B210	10/01/21	MSO	Meeting with D. Brickley and Claro regarding various hotel operational issues to be addressed (.1.0); review and comment on letter to hotel employees regarding transition (.3); receive and review proposed management agreement from GF counsel (.4)	1.7	\$675/hr	\$1,147.50
B210	10/01/21	RAO	Review and edit CRO letter to employees re: transition (.2); Review and begin redlining proposed management agreement w/ BTTX Associates (1.7); Meetings w/ M. Okin and D. Brickley re: management agreement, letter to employees, and transition issues (.6);	2.5	\$400/hr	\$1,000.00
B210	10/02/21	MSO	Email discussion with M. McClure regarding transition issues and getting in touch with S. Tyler (.5); telephone call with D. Brickley regarding same (.3); review Lender comments on management agreement (.4)	1.2	\$675/hr	\$810.00
B210	10/02/21	RAO	Review and analyze email correspondence from B. Roman, D. Brickley, M. McClure, and M. Okin re: CRO transition letter, management agreement, and related issues (.3); Review Lender redline of proposed management agreement (.4); Continue editing proposed management agreement (3.4);	4.1	\$400/hr	\$1,640.00
B210	10/04/21	MSO	Review changes to management agreement and set up call to go over issues with Claro (.7); video conference with Claro and CRO to discuss management agreement changes and other operational issues (.9); review remaining changes and forward revised agreement to GF counsel (.4); continue trying to arrange contact between D. Brickley and C. Tyler via M. McClure (.5)	2.5	\$675/hr	\$1,687.50
B210	10/04/21	RAO	Continue editing proposed management agreement and incorporating Lender comments (2.2); Circulate email to working group re: draft and comments on management agreement and incorporate changes per responses (.2); Prepare for and attend conference call w/ CRO, Claro, and M. Okin re: management agreement and transition issues (1.1); Additional edits to management agreement per conference call discussion (.3); Review various email correspondence from M. Okin and Lender counsel re: management agreement, cash collateral issues, and related transition issues (.4);	4.2	\$400/hr	\$1,680.00
B210	10/05/21	MSO	Travel to Webster with Claro to visit hotel, walk hotel property and visit with staff (2.5); return to Houston (.5)	3	\$675/hr	\$2,025.00
B210	10/06/21	RAO	Review and exchange various email correspondence w/ Lender counsel re: case update and hotel operations (.3); Review and exchange emails w/ B. Roman re: locksmith issues and invoice (.2);	0.5	\$400/hr	\$200.00
B210	10/11/21	MSO	Draft email to JPMC counsel regarding difficulties with bank account transfer (.4); review response from JPMC counsel and reply (.2); participate in call with management company regarding terms of management agreement (.4)	1	\$675/hr	\$675.00
B210	10/11/21	RAO	Review and analyze Holiday Inn franchise statement and reservation of rights, and various email correspondence from M. Okin, E. Seitz and L. Lerner re: same (.4);	0.4	\$400/hr	\$160.00
B210	10/12/21	MSO	Discuss status of bank account transfer with D. Brickley (.2); inform court of resolution of bank account status (.1)	0.3	\$675/hr	\$202.50
B210	10/12/21	RAO	Review email correspondence from M. Okin and L. Lerner and prepare for and attend conference call w/ IHG counsel re: case administration issues and business operations (.4); Meet w/ M. Okin re: results of same and case strategy issues (.2); Review follow up emails from L. Lerner re: hotel inspection and buyer application process (.2);	0.8	\$400/hr	\$320.00
B210	10/18/21	MSO	Review IHG hotel inspection report and forward to Claro	0.4	\$675/hr	\$270.00
B210	10/18/21	RAO	Review and analyze email correspondence and attachments from L. Lerner re: hotel inspection (.4);	0.4	\$400/hr	\$160.00
B210	10/19/21	MSO	Discuss new insurance quote with D. Brickley and review documents (.3); discuss renewal quote and payments with B. Roman (.2); email discussion with E. Seitz regarding insurance coverage and possible need to force place insurance (.3)	0.8	\$675/hr	\$540.00
B210	10/19/21	RAO	Review and analyze email correspondence and attachments from D. Brickley and M. Okin re: Insurance renewal proposal (.4); Meet w/ B. Roman re: same (.1); Analyze loan docs and draft email to B. Roman and D. Brickley re: insurance requirements (.3);	0.8	\$400/hr	\$320.00
B210	10/25/21	RAO	Review and analyze email correspondence and attachment from E. Seitz re: Debtor's insurance invoice (.1);	0.1	\$400/hr	\$40.00
B210	10/28/21	MSO	Email to A. Casas regarding JPMC issues (.2); discuss with D. Brickley (.2); respond to A. Casas (.2)	0.6	\$675/hr	\$405.00
B210	10/28/21	RAO	Review and analyze email correspondence from M. Okin and A. Casas re: Chase account issues (.2);	0.2	\$400/hr	\$80.00
B210	10/29/21	MSO	Telephone conference with JPMC internal counsel to resolve payment issues (.3); follow-up with D. Brickley (.2)	0.5	\$675/hr	\$337.50
B210	10/29/21	RAO	Review and analyze email correspondence and attachment from E. Seitz and A. Price re: GF management agreement revisions (.3);	0.3	\$400/hr	\$120.00
B210	10/29/21	RAO	Review and analyze email correspondence from M. Okin and UST re: Debtor's MORs (.1);	0.1	\$400/hr	\$40.00
B210	10/30/21	RAO	Review and analyze email correspondence from M. Okin re: GF management revisions to agreement (.1)	0.1	\$400/hr	\$40.00
B210	11/01/21	MSO	Review GF changes to the management agreement and follow-up with Claro (.4); review Claro comments (.2)	0.6	\$675/hr	\$405.00
B210	11/02/21	MSO	Discuss franchise fee issue with IHG counsel and Claro	0.3	\$675/hr	\$202.50
B210	11/02/21	RAO	Review and analyze email correspondence from M. Okin, L. Lerner and B. Roman re: IHG franchise fee issues (.3);	0.3	\$400/hr	\$120.00
B210	11/06/21	MSO	Email and phone discussion with E. Seitz regarding delay in retaining GF and comments to agreement	0.5	\$675/hr	\$337.50
B210	11/08/21	MSO	Discuss franchise fee and PIP issues via email with L. Lerner and set up call with clients (.5); discuss call with client (.2)	0.7	\$675/hr	\$472.50
B210	11/08/21	MSO	Review revisions to GF agreement and discuss with R. O'Connor (.4); forward revisions to A. Kazman Price (.2)	0.6	\$675/hr	\$405.00
B210	11/08/21	RAO	Edit GF management agreement and confer w/ M. Okin re: redlines to same (.8); Review and analyze email correspondence from M. Okin re: same (.1); Review and analyze court's orders on applications to employ OA and Claro (.2);	1.1	\$400/hr	\$440.00
B210	11/09/21	MSO	Prepare for and participate in call with IHG and client regarding PIP and past due franchise fees	0.6	\$675/hr	\$405.00

B210 -- Business Operations

Code	Date	Staff	Description	Hours	Rate	Billed Amount
B210	11/10/21	RAO	Review and analyze email correspondence from D. Brickley and H. Bigley re: Debtor's 401k plan and business issues (.2);	0.2	\$400/hr	\$80.00
B210	11/12/21	MSO	Telephone conference with E. Seitz and A. Price regarding revisions to GF contract and create list of changes to be made (.8); discuss revisions with R. O'Connor (.2); review revised agreement and circulate to GF (.3)	1.3	\$675/hr	\$877.50
B210	11/15/21	MSO	Discuss status of GF operating agreement with E. Seitz (.1); follow-up with D. Brickley regarding GF status and pushing deal forward (.3); conference with R. O'Connor regarding operator and cash collateral issues (.4); review correspondence regarding insurance issue for operator (.1); respond to D. Brickley email regarding conversation with lender and changes to reporting (.2)	1.1	\$675/hr	\$742.50
B210	11/15/21	RAO	Review and analyze various email correspondence and attachments from M. Okin, D. Brickley, and E. Seitz re: employment of BTTX as hotel operator (.5); Continue drafting and editing operator employment application and proposed order (1.8);	2.3	\$400/hr	\$920.00
B210	11/16/21	MSO	Review and comment on motion to retain operator (.5); circulate final version to GF counsel (.1); discuss terms of agreement and insurance issues with E. Seitz (.3); review emails regarding insurance coverage concerns and open issues (.2)	1.1	\$675/hr	\$742.50
B210	11/16/21	RAO	Review and analyze email correspondence from Claro and M. Okin re: Phase 1 inspection, insurance, and marketing process items (.3);	0.3	\$400/hr	\$120.00
B210	11/17/21	MSO	Discuss status of agreement with E. Seitz via email	0.3	\$675/hr	\$202.50
B210	11/18/21	RAO	Review and analyze email correspondence and attachments from E. Seitz and M. Okin re: insurance policy renewal issues (.3);	0.3	\$400/hr	\$120.00
B210	11/23/21	MSO	Review E. Seitz email regarding GF retention and insurance issues (.1); discuss insurance issues with B. Roman and review information from broker (.2); follow-up emails with E. Seitz and C. Gibbs regarding misunderstandings over GF retention and insurance (.2); conference with D. Brickley regarding GF and insurance issues (.3); telephone conference with lender counsel regarding GF and insurance (.3); review revised management agreement attachment and finalize (.4)	1.5	\$675/hr	\$1,012.50
B210	11/23/21	RAO	Review and analyze various email correspondence from M. Okin, E. Seitz and C. Gibbs re: insurance issues and GF employment (.4); Meet w/ M. Okin re: same (.2);	0.6	\$400/hr	\$240.00
B210	11/30/21	RAO	Review and analyze email correspondence from M. Okin and L. Lerner re: conference call to discuss IHG issues and meet w/ M. Okin re: same (.3);	0.3	\$400/hr	\$120.00
B210	12/07/21	RAO	Review and analyze email correspondence from C. Rubio and M. Okin re: Lender lift stay issues and retention of BTTX (.2);	0.2	\$400/hr	\$80.00
B210	12/07/21	MSO	Review and approve for filing witness and exhibit list for BTTX hearing	0.3	\$675/hr	\$202.50
B210	12/27/21	MSO	Review franchise fee statement from lender and follow-up with Claro regarding status of payment and correct amount (.6); review further information provided by client (.2)	0.8	\$675/hr	\$540.00
B210	12/28/21	MSO	Review draft declaration for status conference and provide comments (.9); review report showing franchise fees (.2)	1.1	\$675/hr	\$742.50
B210	01/11/22	MSO	Telephone conference with D. Brickley regarding PIP loan and related expenses and review bank statements from lender	0.7	\$675/hr	\$472.50
TOTALS				43.6	\$548/hr	\$23,902.50

B230 -- Financing/Cash Collateral

Code	Date	Staff	Description	Hours	Rate	Billed Amount
B230	10/01/21	MSO	Follow-up discussion with E. Seitz regarding various issues to address including use of cash collateral and budget	0.6	\$675/hr	\$405.00
B230	10/04/21	MSO	Email discussion with lender counsel regarding cash collateral order and budget for remaining case	0.3	\$675/hr	\$202.50
B230	10/05/21	MSO	Conferences with R. O'Connor regarding cash collateral order, lender changes to management agreement and compliance with lift stay order (.3); receive and review draft cash collateral order (.2)	0.5	\$675/hr	\$337.50
B230	10/05/21	RAO	Meetings w/ M. Okin re: case strategy issues, management agreement, and cash collateral (.3); Review and analyze email correspondence from E. Seitz re: draft cash collateral order, review draft, and begin redlining same (1.2);	1.5	\$400/hr	\$600.00
B230	10/06/21	MSO	Review R. O'Connor revisions to cash collateral order and discuss further changes (.5); review lender comments and final revisions (.5)	1	\$675/hr	\$675.00
B230	10/06/21	RAO	Meetings and email correspondence w/ M. Okin re: revisions to cash collateral order and continue drafting and editing same per comments (1.4); Review and exchange various emails w/ Lender and Claro re: draft cash collateral order and make additional edits per comments (.5);	1.9	\$400/hr	\$760.00
B230	10/08/21	MSO	Discuss status of revised budget with D. Brickley and L. Miller (.2); review draft budget and comment (.4)	0.6	\$675/hr	\$405.00
B230	10/11/21	MSO	Discuss cash collateral budget with Claro and finalize (.8); draft status update email to lender and forward proposed budget (.6)	1.4	\$675/hr	\$945.00
B230	10/11/21	RAO	Review and analyze various email correspondence from M. Okin and Claro team re: cash collateral budget, bank account issues, and case administration strategy items (.6); Review draft cash collateral budget and discuss same w/ M. Okin (.2);	0.8	\$400/hr	\$320.00
B230	10/12/21	MSO	Finalize budget and cash collateral order and discuss final items with E. Seitz (.4); forward order and budget to SBA counsel and respond to SBA counsel questions (.5); finalize order for filing (.2); address questions regarding language from SBA (.3)	1.4	\$675/hr	\$945.00
B230	10/12/21	RAO	Review and analyze various email correspondence from M. Okin, R. Kincheloe, and E. Seitz re: cash collateral order and budget issues (.5); Finalize and file cash collateral order (.2); Review additional email correspondence from R. Kincheloe, M. Okin and E. Seitz re: SBA comments to same and revised order (.3);	1	\$400/hr	\$400.00
B230	10/13/21	MSO	Review IHG email regarding cash collateral order and follow-up with lender's counsel (.3); telephone conference with E. Seitz regarding IHG requested language (.3)	0.6	\$675/hr	\$405.00
B230	10/13/21	RAO	Review and analyze SBA comments to cash collateral order, incorporate same, confer w/ M. Okin and file cash collateral order (.4); Draft notice of withdrawal of original stipulated cash collateral order and file same (.5); Review and analyze various email correspondence from L. Lerner, C. Gibbs and M. Okin re: IHG requested cash collateral language (.3); Review and analyze various email correspondence from M. Okin, D. Brickley and E. Seitz re: Lender wiring instructions for adequate protection payment (.2);	1.4	\$400/hr	\$560.00
B230	10/14/21	MSO	Discuss IHG issue with cash collateral order with L. Lerner (.2); review draft stipulation regarding payment of post petition fees (.2); discuss with E. Seitz (.2)	0.6	\$675/hr	\$405.00
B230	10/14/21	RAO	Review and analyze various email correspondence from M. Okin and L. Lerner re: stipulation regarding franchise agreement fee payments (.2); Meetings w/ M. Okin re: strategy for same and related case administration issues (.3); Draft stipulation and exchange various emails w/ M. Okin, L. Lerner, and E. Seitz re: same (.9); Finalize and file stipulation (.1);	1.5	\$400/hr	\$600.00
B230	10/25/21	MSO	Telephone conference with E. Seitz regarding discussion with client and budget going forward	0.5	\$675/hr	\$337.50
B230	11/04/21	MSO	Review draft cash collateral budget and discuss with B. Roman (.5); forward draft budget to E. Seitz for lender approval (.2)	0.7	\$675/hr	\$472.50
B230	11/09/21	MSO	Follow-up with E. Seitz regarding cash collateral budget (.2); discussion with R. O'Connor regarding same (.3)	0.5	\$675/hr	\$337.50
B230	11/09/21	RAO	Review and analyze email correspondence from M. Okin and E. Seitz re: updated cash collateral budget items (.2); Meetings w/ M. Okin re: cash collateral and GF employment issues (.3);	0.5	\$400/hr	\$200.00
B230	11/10/21	MSO	Discussions with Claro regarding lender question on capital expenditures and review revised budget (.8); final review of budget and draft email to E. Seitz forwarding budget (.4)	1.2	\$675/hr	\$810.00
B230	11/11/21	MSO	Discuss budget and other case issues with E. Seitz (.5); discuss results of lender call with client (.3); receive further inquiry from lender on budget to actual and discuss with Claro (.3)	1.1	\$675/hr	\$742.50
B230	11/11/21	RAO	Review and analyze email correspondence from M. Okin, E. Seitz and D. Brickley re: cash collateral and business issues (.3);	0.3	\$400/hr	\$120.00
B230	11/15/21	MSO	Receive and review budget variance information and forward to lender's counsel (.5); discuss approval of November cash collateral budget with E. Seitz via extended email exchange (.6); discuss status of budget approval with D. Brickley (.3)	1.4	\$675/hr	\$945.00
B230	11/15/21	RAO	Review and analyze email correspondence from M. Okin and Claro re: cash collateral issues (.3); Meetings w/ M. Okin re: same (.3);	0.6	\$400/hr	\$240.00
B230	11/16/21	MSO	Review status of outstanding fees and provide Claro with updated budget and accrual information	0.5	\$675/hr	\$337.50
B230	12/09/21	MSO	Review draft budget for completing case and answer B. Roman question regarding adequate protection payments	0.5	\$675/hr	\$337.50
B230	12/09/21	MSO	Telephone conference with E. Seitz in advance of hearing to discuss status of sale, use of cash and timing of decision on lender purchase of property (.4); prepare for and participate in hearing and status conference with Court (1.2)	1.6	\$675/hr	\$1,080.00
B230	12/10/21	MSO	Further review of cash budget and discuss with B. Roman (.4); conference call with Claro regarding revisions to budget for remainder of case (.8); review budget with revisions and emails regarding further revisions (.3)	1.5	\$675/hr	\$1,012.50

B230 -- Financing/Cash Collateral

Code	Date	Staff	Description	Hours	Rate	Billed Amount
B230	12/10/21	RAO	Review and analyze email correspondence from M. Okin and D. Brickley re: cash collateral budget issues and revisions for same (.2); Meet w/ M. Okin re: revisions to budget (.2); Review and analyze email correspondence from L. Clayton and D. Brickley re: revised budget draft (.3);	0.7	\$400/hr	\$280.00
B230	12/13/21	RAO	Review email correspondence from M. Okin and E. Seitz re: amended cash collateral budget and stipulated order (.3); Begin drafting agreed order re: cash collateral and meet w/ M. Okin re: issues for same (.8); Review and analyze prior cash collateral stipulation and budgets (.3);	1.4	\$400/hr	\$560.00
B230	12/14/21	MSO	Email discussion with E. Seitz regarding lack of agreement to extend use of cash collateral (.5); discuss response to lender delay with D. Brickley (.2)	0.7	\$675/hr	\$472.50
B230	12/15/21	MSO	Email discussion of approval of the budget by lender (.3); arrange for status conference with bankruptcy court and notice hearing (.3); discuss status with client (.2); draft and send response to C. Gibbs (.2)	1	\$675/hr	\$675.00
B230	12/15/21	RAO	Review and analyze various email correspondence from M. Okin, Court, and other parties re: emergency hearing on cash collateral (.4);	0.4	\$400/hr	\$160.00
B230	12/16/21	MSO	Finalize and file notice of emergency status conference (.1); telephone conference with C. Gibbs and E. Seitz regarding terms of new order and budget (.7); work on revisions to budget to match agreement with lender's counsel (.6); review and comment on revised cash collateral order and finalize order and budget for filing in advance of hearing (.8); prepare for and participate in status conference with Court (.8); review and approve revisions to order per comments at hearing (.4); email discussion with counsel for SBA regarding comments on order (.6)	4	\$675/hr	\$2,700.00
B230	12/16/21	RAO	Various meetings w/ M. Okin re: cash collateral hearing and strategy (.4); Review Lender proposed cash collateral order and make redline changes to same, meetings and email correspondence w/ M. Okin and other parties re: revisions to same (.5); Edit and file proposed cash collateral order (.2); Prepare for and attend cash collateral hearing (1.1); Various meetings and email correspondence w/ M. Okin and other parties re: revisions to same after hearing (.7); Continue revising proposed cash collateral order per comments received (.7); Call w/ M. Okin re: SBA revisions to cash collateral order (.2); Review and analyze email correspondence from D. Brickley re: adequate protection payments to Lender (.1); Review and analyze Lender's notice of election to foreclose on property (.1);	4	\$400/hr	\$1,600.00
B230	12/17/21	MSO	Review R. Kincheloe's threatening email and discuss with client (.3); finalize proposed order with other parties, review and approve notice of filing and file (.5)	0.8	\$675/hr	\$540.00
B230	12/17/21	RAO	Review and analyze various email correspondence from parties re: revised cash collateral order (.4); Meetings w/ M. Okin re: same (.3); Draft notice of filing revised proposed order (.4); Confer w/ M. Okin re: revisions to draft and file same (.2); Review email correspondence w/ Court re: order and hearing on same (.2); Review and analyze Court's interim order on cash collateral and exchange various emails w/ working group re: same (.3);	1.8	\$400/hr	\$720.00
B230	12/19/21	MSO	Review R. Kincheloe email to court and objection to use of cash collateral (.4); circulate to client with comments (.2)	0.6	\$675/hr	\$405.00
B230	12/19/21	RAO	Review and analyze email correspondence from SBA counsel and Court re: interim cash collateral order and request for hearing (.2); Review and analyze SBA's objection to cash collateral and email correspondence from M. Okin re: issues for same (.4);	0.6	\$400/hr	\$240.00
B230	12/20/21	RAO	Review and analyze various email correspondence from M. Okin, R. Kincheloe, and Court re: SBA objection to cash collateral and hearing on same (.3); Review and analyze SBA's objection (.4); Review and analyze various email M. Okin and D. Curry re: objection and UCC filing issues (.3);	1	\$400/hr	\$400.00
B230	12/22/21	RAO	Review and analyze SBA transcript request of cash collateral hearing and confer w/ M. Okin re: issues for same (.1);	0.1	\$400/hr	\$40.00
B230	12/27/21	RAO	Review and analyze various email correspondence and attachments from M. Okin, B. Roman, E. Seitz re: cash collateral budget, franchise fee payments, and related issues (.5); Review and analyze email correspondence and attachments from M. Okin, D. Brickley and B. Roman re: CRO declaration in support of cash collateral order (.3);	0.8	\$400/hr	\$320.00
B230	12/28/21	RAO	Review and analyze various email correspondence from M. Okin, B. Roman and D. Brickley re: CRO declaration and revisions for cash collateral issues (.3);	0.3	\$400/hr	\$120.00
B230	12/29/21	MSO	Email discussion with E. Seitz regarding transition issues and use of cash	0.4	\$675/hr	\$270.00
B230	12/29/21	RAO	Review Court's second interim order on cash collateral (.1);	0.1	\$400/hr	\$40.00
B230	12/29/21	RAO	Review and analyze various email correspondence from M. Okin, B. Roman and D. Brickley re: further revisions to CRO declaration and preparation for cash collateral hearing (.2); Review and analyze various email correspondence from M. Okin, E. Seitz and C. Gibbs re: cash collateral budget issues (.3);	0.5	\$400/hr	\$200.00
B230	12/30/21	MSO	Telephone conference with E. Seitz and C. Gibbs regarding use of cash and transition issues (.4); prepare for and participate in telephonic hearing on continued use of cash collateral (1.3); follow-up discussion with D. Brickley after hearing (.3)	2	\$675/hr	\$1,350.00
B230	12/30/21	RAO	Attend status conference and hearing on cash collateral (1.1);	1.1	\$400/hr	\$440.00
B230	12/31/21	MSO	Review lender email regarding starting bid price for hotel and forward to client (.2); review SBA notice of appeal and circulate (.2)	0.4	\$675/hr	\$270.00
B230	12/31/21	RAO	Review and analyze email correspondence from C. Gibbs and M. Okin re: Lender foreclosure sale bid (.2); Review and analyze SBA's notice of appeal of cash collateral order and email correspondence from M. Okin and D. Brickley re: same (.2);	0.4	\$400/hr	\$160.00
B230	01/12/22	MSO	Telephone conference with E. Seitz regarding PIP issue and prior bank statements (.4); review statements and forward to E. Seitz (.2)	0.6	\$675/hr	\$405.00
TOTALS				49.7	\$549/hr	\$27,305.00

B240 -- Tax Issues

Code	Date	Staff	Description	Hours	Rate	Billed Amount
B240	12/01/21	RAO	Review and analyze various email correspondence and attachments from D. Brickley and B. Roman re: tax issues for Cheryl Tyler affiliated entity (.2);	0.2	\$400/hr	\$80.00
TOTALS				0.2	\$400/hr	\$80.00

B310 -- Claims Administration

Code	Date	Staff	Description	Hours	Rate	Billed Amount
B310	10/30/21	RAO	Review and analyze Lender's POC filed (.2);	0.2	\$400/hr	\$80.00
B310	11/01/21	RAO	Review and analyze Synchrony Bank proof of claim (.2);	0.2	\$400/hr	\$80.00
B310	11/09/21	RAO	Review IHG proof of claim and exchange emails w/ B. Roman re: same (.3);	0.3	\$400/hr	\$120.00
B310	12/08/21	RAO	Review and analyze Harris County POC (.2);	0.2	\$400/hr	\$80.00
B310	01/05/22	RAO	Review and analyze SBA's proof of claim (.3);	0.3	\$400/hr	\$120.00
TOTALS				1.2	\$400/hr	\$480.00

E101 -- In House Copying

Code	Date	Description	Quantity	Rate	Billed Amount
COPY	10/31/21	Copies-October 2021	27	0.1	\$2.70
COPY	11/30/21	Copies-November 2021	34	0.1	\$3.40
COPY	12/31/21	Copies-December 2021	64	0.1	\$6.40
TOTALS			125	0.1	\$12.50

E106 -- Online Research

Code	Date	Description	Billed Amount
PCR	09/30/21	PACER-September 2021	\$6.60
LEXIS	10/31/21	Lexis Nexis research-October 2021	\$74.81
PCR	10/31/21	PACER charges-October 2021	\$36.30
LEXIS	11/30/21	Lexis Research-November 2021	\$32.43
PCR	11/30/21	PACER-November 2021	\$3.10
LEXIS	12/31/21	Lexis Nexis research-December 2021	\$24.43
PCR	12/31/21	PACER-December 2021	\$14.30
TOTALS			\$191.97

E108 -- Postage

Code	Date	Description	Billed Amount
POST	10/31/21	Postage-October 2021	\$8.59
TOTALS			\$8.59